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April 22, 2021

BY ECF

Hon. Lewis J. Liman United States District Judge U.S. Courthouse 500 Pearl Street New York, NY 10007 MOTION GRANTED.

David K. Bertan is to be assigned as cocounsel for defendant Isabella Pollok.

4/23/2020 so ordered.

LEWS I LIMAN

Re:

United States v. Isabella Pollok

20 Cr. 110 (LJL)

Dear Judge Liman:

On April 16, 2021, I was appointed by this Court as CJA counsel to represent Defendant Isabella Pollok in the above-captioned matter. I am submitting this lettermotion as my application to have co-counsel appointed also to represent Ms. Pollok in this case.

As noted in Section VII (C)(4) of the CJA Plan for this District, where a difficult case requires additional counsel, the Court is authorized to appoint two or more attorneys to represent the Defendant. Given the complexity of this case, and the volume of discovery (at this point the discovery produced by the government is estimated to be 22 Terabytes), I am respectfully requesting that David K. Bertan, Esq., a member of this Court's CJA Panel for ten years, be assigned as my co-counsel. He has had significant experience cases in complex cases and is prepared to assist me in representing Ms. Pollok for all purposes.

Thank you for the Court's consideration of this application..

Respectfully submitted,

/s/

Richard B. Lind

cc: All counsel (by ECF)